

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF:) Chapter 7
)
LORENA MARIN,) Case No. 20-04207
and,)
RODOLFO MARIN,) Hon. Judge: BARNES
Debtor(s).)

NOTICE OF MOTION

To the following persons or entities have been served via electronic mail:

U.S. Trustee: USTPRegion11.ES.ECF@usdoj.gov

Gus Paloian, as Chapter 7 Trustee: gpaloian@seyfarth.com

To the following persons or entities have been served via U.S. Mail:

Lorena and Rodolfo Marin, 3039 Atlantic Street, Franklin Park, IL 60131

Wells Fargo Auto, P.O. Box 130000, Raleigh, NC 27605

PLEASE TAKE NOTICE that on June 17, 2020, at 10:00 a.m./p.m., I will appear before the Hon. Judge Barnes, or any judge sitting in that judge's place, and present the Debtors' Motion to Extend the Time to File A Reaffirmation Agreement, a copy of which is attached.

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at www.CourtSolutions.com or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: Michael R. Colter, II
David M. Siegel & Assoc., LLC
790 Chaddick Drive
Wheeling, IL 60090
847/520-8100 – mcolter@davidmsiegel.com

CERTIFICATE OF SERVICE

I, Michael R. Colter, II, declare under penalty of perjury under the laws of the United States of America that I served a copy of this notice and the attached motion on each entity shown on the above service list at the address shown and by the method indicated on the list on May 27, 2020, at 5:00 p.m.

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MOTION TO EXTEND TIME TO FILE A REAFFIRMATION AGREEMENT

NOW COME the Debtors, LORENA MARIN, and RODOLFO MARIN, by and through their attorneys, DAVID M. SIEGEL and ASSOC., LLC, to present this Motion, and in support thereof states as follows:

1. Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
2. Debtors filed relief pursuant to Chapter 7 under Title 11 USC February 14, 2020.
3. Debtor's counsel experienced delay in getting a reaffirmation agreement on a 2012 Honda Odyssey financed through Wells Fargo Auto due to the COVID-19 pandemic.
4. The deadline to object to discharge is May 29, 2020. Typically the court enters the Order of Discharge within days of this deadline.
5. Debtors seek to extend the time to file a reaffirmation agreement so that they can reaffirm on the 2012 Honda Odyssey.

WHEREFORE, the Debtors, LORENA MARIN, and RODOLFO MARIN, prays that this Honorable Court enter an Order to Extend the Time to File A Reaffirmation Agreement, and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II
Michael R. Colter, II, A.R.D.C. #6304675
Attorney for the Debtor

DAVID M. SIEGEL & ASSOCIATES LLC
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